

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA )

vs. )

VINESSA DONATELLI )

2007 SEP 17 P 3:25

Case No. 2:06-CR-272-MEF

**DEFENDANT'S MOTION TO SEAL MOTION FOR DOWNWARD DEPARTURE**

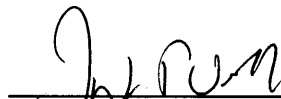
COMES NOW, the defendant, Vinessa Donatelli, by and through undersigned counsel, Joseph P. Van Heest, and hereby files her Motion to Seal Motion for Downward Departure and in support of this motion, states the following:

The enclosed motion is filed under seal to be opened by the Court and not to be filed in the court file unless placed under seal and not be made available for public viewing or access because of the confidential nature of medical records and issues raised herein.

A copy of the motion and exhibits has been provided to the Assistant United States Attorney and to the United States Probation Officer.

WHEREFORE, for the reasons set forth above, defendant prays that this Court will grant her Motion and seal the enclosed Motion for Downward Departure so that it remains inaccessible to the general public in order to protect Ms. Donatelli's privacy in her medical records.

Respectfully submitted



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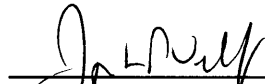
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2007, , I served by hand delivery, the foregoing document, on the following:

Hon. Andrew O. Schiff,  
Assistant United States Attorney  
Post Office Box 197  
Montgomery, AL 36101-0197  
Counsel for the Government

Respectfully submitted,



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